

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

DEC 14 2017

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 17-301063-DRH
vs.)	
)	
WENDY BUCH,)	
)	
Defendant.)	

STIPULATION OF FACTS

Comes now Donald S. Boyce, United States Attorney for the Southern District of Illinois through Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, Wendy Buch (hereinafter "Defendant") with the advice and consent of Daniel Cronin, counsel for the Defendant, as follows:

1. From on or about January of 2014 and continuing through June of 2016, in St. Clair County, within the Southern District of Illinois, Wendy Buch, while an employee of the Transportation Communications Union Lodge T-574, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the money, funds, properties, and other assets of said labor organization.

2. TCU Lodge T-574 is based in East St. Louis, Illinois. The union has approximately 75 members who are employed by Alton & Southern Railway, Union Pacific, and Terminal Railroad in clerical and janitorial positions. The union is governed by a uniform constitution and bylaws from Transportation Communications Union (TCU) and the International Association Machinists

(IAM). To fund the union, Members of Lodge T-574 currently pay \$88.79 per month in union dues. All members must pay a \$200 initiation fee to join the union.

3. Wendy Buch was appointed financial secretary-treasurer of Lodge T-574 in approximately April of 2014. She held that position until she resigned on May 31, 2016. As financial secretary-treasurer, Wendy Buch was responsible for handling payroll, writing checks and preparing financial reports, such as Form LM-3. She was the sole check signatory on the union's checking and saving account.

4. Wendy Buch misappropriated \$11,957.34 from the union's checking account from June 2014 through April 2016 by writing unauthorized checks to herself and by making unauthorized withdrawals. She then concealed her actions by making false entries on the union's Labor Organization Annual Financial Report (Form LM-3). Wendy Buch used the embezzled funds to pay her personal bills.

5. On or about September 30, 2015, in St. Clair County, within the Southern District of Illinois, Wendy Buch, did make a false statement and representation of material fact about the total salary and other disbursements that she received, knowing it to be false, in a report and document required to be filed by the Transportation Communications Union Lodge T-574, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM-3 for the union's fiscal year ending on December 31, 2014.

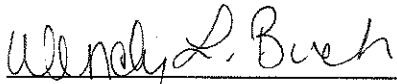
6. On or about March 31, 2016, in St. Clair County, within the Southern District of Illinois, Wendy Buch, did make a false statement and representation of

material fact about the total salary and other disbursements that she received, knowing it to be false, in a report and document required to be filed by the Transportation Communications Union Lodge T-574, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM-3 for the union's fiscal year ending on December 31, 2015.


7. No matters are in dispute.

SO STIPULATED:

DONALD S. BOYCE
United States Attorney


WENDY BUCH
Defendant
Attorney


NORMAN R. SMITH
Assistant United States


DANIEL CRONIN
Attorney for Defendant

Date: 12/14/2017